FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND (

BY AVIN DEPUTY

FREDA SHELTON,
Plaintiff.

CASE NO.

puch 13CV 3526

vs.

UNITED CONSUMERS, INC.;
EQUIFAX INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS, INC.;
and TRANS UNION LLC;
Defendants.

TRANS UNION, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the Circuit Court for Prince George's County, Maryland, to the United States District Court for the District of Maryland, on the following grounds:

- 1. Plaintiff Freda Shelton served Trans Union on or about November 19, 2013, with a Writ of Summons, Complaint and a Civil-Non-Domestic Case Information Report filed in the Circuit Court for Prince George's County, Maryland. Copies of the Writ of Summons, Complaint and Civil-Non-Domestic Case Information Report are attached hereto as **Exhibit A**, **Exhibit B**, and **Exhibit C**, respectively. No other process, pleadings or orders have been served on Trans Union.
- 2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"). See Complaint ¶¶ 1, 25, 28, 29, 33 and 34.

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3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331

since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this

federal question.

Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Circuit Court

for Prince George's County, Maryland, to the United States District Court for the District of Maryland.

5. To the best of Trans Union's knowledge, the other named Defendants in this matter have

not been served as of the date of this Notice of Removal. Trans Union has confirmed with the Clerk of

the Circuit Court For Prince George's County, Maryland, both online and by telephone, that they have

no document or file suggesting any other Defendant has been served.

Notice of this removal will promptly be filed with the Circuit Court for Prince George's 6.

County, Maryland and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the

Circuit Court for Prince George's County, Maryland to this United States District Court, District of

Maryland.

Respectfully submitted,

H. Mark Stichel, Esq. (MD Federal Bar #02939)

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Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the 21st day of November, 2013, properly addressed as follows:

Pro Se Plaintiff	
Freda Shelton	
9087 Hardesty Drive	
Clinton, MD 20735	

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Counsel for Defendant Trans Union, LLC